

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA, ) Case No.:2:15-mj-00570-CWH  
Plaintiff, )  
vs. )  
DANIEL PAZ-HERRERA, ) STIPULATION TO CONTINUE  
Defendant. ) BENCH TRIAL  
 ) (Second Request)  
 )

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Nadia Ahmed, Special Assistant United States Attorney, counsel for the United States of America, and Jay L. Siegel, Esquire, counsel for defendant **DANIEL PAZ-HERRERA**, that the bench trial in the above-captioned matter, currently scheduled for January 27, 2016, at the hour of 9:00 a.m., be vacated and continued for ninety (90) days or to a date and time convenient to the Court.

This stipulation is entered into for the following reasons:

1. The parties are still in the process of negotiating a resolution of the case that would obviate the need for trial. The parties need additional time to do so.

2. Defendant is out of federal custody and agrees to the continuance.

3. Denial of this request for a trial continuance would prejudice both the Defendants and the Government and unnecessarily consume this Court's valuable resources, taking into account the exercise of due diligence.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

5. The additional time requested by this stipulation, is excludable in computing the time within which the defendant must be indicted and the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(b) and 3161(h)(8)(A), considering the factors under 18 U.S.C. § 3161(h)(8)(B)(I ) and (iv).

6. This is the second request for continuance of the trial in this case.

DATED this      day of January, 2016.

Respectfully submitted,

DANIEL G. BOGDEN  
United States Attorney

/s/ Jay L. Siegel

/s/ Nadia Ahmed

JAY L. SIEGEL, ESQ.  
Counsel for defendant  
**DANIEL PAZ-HERRERA**

NADIA AHMED  
Special Assistant United States Attorney

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5           **UNITED STATES DISTRICT COURT**  
6           **DISTRICT OF NEVADA**

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8       UNITED STATES OF AMERICA,    ) Case No: 2:15-MJ-00570-CWH  
9    )  
10    )  
11    ) ORDER CONTINUING  
12    )  
13    ) BENCH TRIAL  
14    )  
15    )  
16       DANIEL PAZ-HERRERA,    )  
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13    Based on the pending stipulation of counsel, and good cause appearing therefore,:  
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15    IT IS HEREBY ORDERED that the bench trial in the above-captioned matter currently  
16    scheduled for January 27, 2016, at the hour of 9:00 a.m., be vacated and continued to \_\_\_\_  
17    Wednesday, April 6  
18    \_\_\_\_\_, 2016, at the hour of 9:00 a.m.

19    DATED this 25th day of January, 2016.

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22    UNITED STATES MAGISTRATE JUDGE  
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